leading zero that information is represented in AT&T Texas' billing systems as information that is "shorter" than the information that was actually conveyed in the signaling (SS7). AT&T Texas then ignores all the zeros it has just inserted for purposes of its "validity test," and claims that the information we send is "invalid". In other words, AT&T Texas is assuming that all leading zeros were inserted by its system and were not passed to AT&T Texas by UTEX in the SS7 signaling. UTEX sees a significant amount of Internet originated traffic that possesses a valid calling party identifier but has a leading zero. Per AT&T internal documentation, the AT&T billing system also systematically treats CPN with lengths less than six digits or greater than eleven digits, as "empty" – as if no information was conveyed in the signaling.

With regard to possible interpretations of CPN content allowed or external references required by the AMA billing standard, in the AT&T usage of AMA, Calling Party Number information is captured in a Module 164 entry. The modules contain fields for identifying the type of information passed, the length and the content. AMA Table 76 enumerates eight types of "Number Identity", including: Originating Automatic Number Identification (ANI), Terminating, Originating Calling Party Number (CPN), Private Originating ANI, Private Originating CPN, Redirecting Number (RN), Original Called Number (OCN), Provisioned Billing Number. [GR-862-CORE, GR-1060-CORE, GR-1083-CORE, GR-3012-CORE, TR-NWT-001212]. None of these categories convey or require a stipulation as to any reference of the included number to any external routing guide or numbering plan.

Furthermore, Table 126 describes the content of the number. The only stipulation regarding a particular numbering plan is that if the length of the number as presented in the signaling is too large for the structure associated with the call, for E.164 numbers, only the

National Significant Number (NSN) is entered. For X.121 numbers only the Network Terminal Number (NTN) is entered. No reference to external routing guide is otherwise mentioned.

Q: DOES UTEX HAVE AN ICA OBLIGATION TO PROVIDE CPN IF ITS CUSTOMER DOES NOT PROVIDE A CALLING NUMBER THAT CAN BE USED TO POPULATE THE CPN PARAMETER IN THE ISUP IAM FOR TRAFFIC HANDED TO AT&T TEXAS?

UTEX has an obligation to provide unaltered CPN. UTEX has an obligation to adhere to a policy of fidelity and non-manipulation, and does not believe in a concept of "validity" unless such definition is arrived at by an order from a regulatory body, or results from a join policy setting by UTEX and AT&T. UTEX technically complies with this obligation on every call it passes to AT&T.

Q: WHAT "CPN" SHOULD BE USED UNDER THE ICA IF THERE IS MORE THAN ONE POTENTIAL "ORIGINATING PARTY NUMBER"?

A: The ICA makes no provisions for the case wherein there is potentially more than one originating party number. In fact, Legacy telephony networks are utterly incapable of conveying this type of information. In contrast, virtually all IP based signaling technologies incorporate this functionality.

Q: DOES THE ICA SPECIFY WHAT "CPN" SHOULD BE USED IF THE CALLING PARTY HAS AN ADDRESS THAT IS NOT AN E164 ADDRESS, SUCH AS AN EMAIL ADDRESS, SIP ADDRESS OR IM SCREEN NAME?

A: The ICA does not define CPN or the various different types of CPN that could exist. See answers above. The ICA per Attachment 12 § 2.2 simply requires each Party to include the

originating CPN, where available. We make sure that this originating CPN is unaltered when we pass it.

Q: WHAT IS THE RESULT UNDER THE ICA IF UTEX's RECORDS SHOW CPN WAS SENT AND AT&T TEXAS' RECORDS SHOW NO CPN WAS RECEIVED?

A: Attachment 12 § 2.4 states "Where one Party is passing CPN but the other Party is not properly receiving information, the Parties will cooperatively work to correctly rate the traffic." UTEX's first statement is that all of UTEX's traffic is from the Internet and thus "no compensation due" under the express terms of Attachment 12 § 1.4.1, but that aside we are happy to work with AT&T if they have a technical problem.

When we worked with AT&T on our only test they led us to believe there was no problem. Nine months subsequent to this test, it seemed they had a "CPN" problem again. We looked at our traffic and showed no problem. Basically we are sending information in the CPN field more than 95% of the time. My analysis of the data above reveals that AT&T manipulates their data to pretend like they receive information in the CPN much less often and then compounds this problem with this whole "Validity" nonsense. Clearly, the parties are at an impasse.

When this occurs the parties are suppose to rely upon express provisions in Attachment 12 7.1-7-5. In essence we revert back to the Percentage Local Usage (PLU) factors submitted on the approved interconnection trunk orders. These clearly denote 100% Local, which UTEX believes is consistent with Attachment 12 §1.2 and the arbitrated result from 17922 that dealt with defining the jurisdiction of calls to and from the Internet as being locally treated for routing and rating.

Q: DO UTEX's CPN POLICIES CAUSE ANY FAILURES IN ANY AT&T TEXAS BILLING SYSTEM OR PRECLUDE AT&T TEXAS FROM BILLING ACCESS CHARGES TO AN IXC USING OR SUBJECT TO AT&T TEXAS'S SWITCHED ACCESS SERVICES?

A: In RFP-1-9-67, AT&T describes in detail the inner workings of the billing logic used in its "Access Over Local" program. Per that description, CPN information is obtained from the Module 164 record associated with the Structure Code 0625 associated with the call. If the Module 164 record is not present, then call processing continues based on a default originating jurisdiction. If CPN is available, then the first six digits are used for a table lookup to determine the originating LATA of the call. A table lookup is also performed on the Called Party Number, which is determined from the Structure Code. If the LATA associated with the Called Party Number does not match the LATA of the CPN, then the call is flagged for CABS billing.

UTEX has instituted a CPN policy that mandates that UTEX switch elements perform no manipulations whatsoever to the CPN as it is passed in the SS7 ISUP signaling. As such, UTEX passes exactly what it receives from its customers. In practice, the CPN passed to AT&T varies in length between one and fifteen digits with the majority of lengths being ten digits long (this will change over time as more new technology traffic evolves). However, since the AT&T Texas billing system examines only the leading six digits, UTEX does not cause harm to the AT&T Texas billing system. Calls with less or more than ten digits are most likely flagged for CABS billing. Calls with ten digits that result in a failed LERG lookup, are also simply flagged for CABS billing. Finally, since UTEX neither removes nor adds information to the CPN it passes to AT&T Texas, UTEX in principle presents no impairments to AT&T Texas if AT&T Texas sought to bill access charges to an IXC associated with the call.

Q: WHEN UTEX RECEIVES AN 11 DIGIT CPN (THE LAST 10 OF WHICH REPRESENT AN NPA, AN NXX AND A LINE NUMBER) BY ITS CUSTOMER, MUST UTEX STRIP THE 1ST DIGIT IF IT IS A 1, 0 OR 9 SO THAT ONLY 10 DIGITS ARE SENT?

A: UTEX's business plan revolves entirely around supporting new technology services and applications. UTEX directly competes with AT&T Texas and its affiliates at the wholesale level for new technology service providers' business. Unlike AT&T Texas, however, UTEX does not (i) require its customers to deploy equipment or processes that turn IP systems into TDM systems or (ii) try to impede new technology deployment and interoperability of this new technology with the Legacy network. UTEX specifically supports the inherent control of users of new technology; while AT&T Texas specifically exerts control over their users' choices. UTEX supports the open network and open platform concepts as a service provider; AT&T Texas wants to kill users' ability to interoperate on open platforms.

In accordance with Attachment 12 § 2.3, UTEX passes to AT&T Texas whatever CPN (if available) our users send to us. Nonetheless, UTEX has been willing to negotiate a joint CPN policy with AT&T Texas. However, AT&T Texas totally refuses to even discuss or consider joint development of a CPN "policy" and the technical means to implement that policy.

Q: WHEN UTEX IS PRESENTED WITH 7 DIGIT CPN (NXX AND LINE NUMBER) IN A CALLING AREA THAT DOES NOT USE 10 DIGIT DIALING, MUST UTEX ADD THE 3 DIGIT NPA TO THE CPN?

A: I do not know AT&T's position. I figure it will always end up in access charge payments by UTEX. UTEX, however would like an answer. We are in the difficult position of being

accused of fraud if we do manipulate the CPN, and accused of fraud if we do not manipulate the CPN. And, coincidentally, AT&T has a billing regime that results in access charges either way.

Q: DOES THE ICA PERMIT UTEX TO INSERT INFORMATION IN THE CPN PARAMETER THAT WILL ALLOW IDENTIFICATION AND INTERWORKING FOR CPN BASED SERVICES? IF SO, WILL OR MUST AT&T TEXAS TO ROUTE TRAFFIC TO THE NON-GEOGRAPHIC NUMBER AS PART OF ITS CPN-BASED SERVICE OFFERINGS? IF SO, WILL OR MUST AT&T TEXAS ROUTE THE TRAFFIC OVER THE PARTIES' INTERCONNECTION FACILITIES RATHER THAN THOSE USED FOR MEET POINT TRAFFIC?

A: I argue that the answer to all the parts of that questions is "yes." Nonetheless, UTEX has thus far followed an explicit policy of CPN non-manipulation. This is an intentionally interim policy that is designed to serve as a stopgap until a joint policy can be created with AT&T Texas, or the PUC or FCC issues a mandate that some kind of information must be inserted.

However, since AT&T Texas has been uncooperative, and no directive has been received from regulators or policy makers, UTEX has begun initial planning on a unilateral CPN population policy which maintains PSTN interoperability to the greatest extent possible. To this end, UTEX has obtained from NANPA 10,000 non-geographic numbers in the "500 block range." Preliminary requests to AT&T to route these legal and valid NANP numbers back to the UTEX network have been summarily refused. Without AT&T's cooperation, the use of 500 numbers to assist in CPN representation will simply not work, since the traffic flow would be uni-directional. If this Commission were to set a policy permitting UTEX to insert a 500 numbers into the CPN field, then a potential solution to identifying a particular customer's traffic as coming from or to the Internet could be realized. Since traffic to or form the Internet is non-geographic in nature, this solution would make sense.

UTEX has also been contacted by the holder of 16 million, 500 block numbers and has been requested to load those numbers into UTEX's routing; but due to AT&T Texas' unreasonable refusal to route 500 numbers to UTEX's network, AT&T Texas' end users are

unable to initiate call session requests addressed to those numbers as well. UTEX has informed this potential customer that service cannot be provided because of AT&T Texas' illegal and unreasonable refusal to route. This customer is eagerly anticipating that this dispute resolution will result in those 16 million, 500 numbers becoming routable and useable via UTEX's IGI POP tariff. The name and contact information of this potential customer is a trade secret and will not be disclosed.

AT&T's failure to route valid UTEX 500 is hurting PSTN to VoIP interoperability. IP telephony endpoints are inherently non-geographic in nature. Most IP telephony users have no need for a geographic designation, and only want their service to interoperate with PSTN users. As such, the UTEX 500 number allocation and intended use provides a potentially simple and powerful step towards better PSTN-VoIP interoperation. At present there is no technical impediment to AT&T loading and routing all of UTEX's 500 numbers. AT&T refuses to do so with its usual hand-waving arguments about feasibility of the task and a demand for access payments no matter what. However, nothing in any relevant routing or signaling standard supports this position. Furthermore, every CLASS 4 and CLASS 5 Legacy switch in production in the AT&T network is capable of routing 500 numbers. AT&T's refusal is simply more of the same bad-faith obstructionism.

Q: DOES THE ICA ADDRESS ANY REQUIREMENT(S) WITH REGARD TO PRESENTATION OF CPN WHEN A NEW TECHNOLOGY DEVICE OR PLATFORM WITHOUT ITS OWN ASSIGNED NANPA PHONE NUMBER ORIGINATES A COMMUNICATIONS SESSION WITH THE PSTN?

A: No. The ICA does not make any references to a specific type of CPN that is to be provided for presentation at all, whether for new or old technology. See answers above.

Below is a table and pictoral timeline showing exhibits related to CPN Issues.

Exhibit #	Date	From	Subject
678	37467	PEDDICORD, PAUL I (SBCSI)	RE: Concurrence Request - #2573 (redacted)/Utex - CPN
647	37366	Cole, Bill (SBCSI)	CPN module
452	37049	Cole, Bill (SBCSI)	utex
477	37063	Josephson, Debbie (SWBT)	RE: contacts
439	37021	Herrera, David (SWBT)	RE: UTEX Technical Contact Numbers
508	37113	Stalnaker, Paul (SWBT)	FW: CPN technical call
668	37441	Vanhoof, Brian K (SBCSI)	FW: files
406	36984	Stalnaker, Paul (SWBT)	FW: Tandem Routing/possible access avoidance
409	36991	Stalnaker, Paul (SWBT)	Sample of UTEX traffic from 04-11-2005
728	37665	Andrews, Peter M (ATTSI)	UTEX validation - January 11, 2007 BI and AMA data
648	37366	Cole, Bill (SBCSI)	CPN module
657	37385	Cole, Bill (SBCSI)	Mod164 recordings
592	37160	Josephson, Debbie (SWBT)	FW: B-Link Follow-up
593	37161	Josephson, Debbie (SWBT)	RE: 211/311 Services
591	37159	Josephson, Debbie (SWBT)	RE: 211/311 Services
594	37161	Cole, Bill (SBCSI)	RE: CPN dispute
618	37224	Brett Nemeroff	Interconnection Efforts
619	37225	Josephson, Debbie (SWBT)	Interconnection Efforts
620	37225	Tutwiler, Sandy (SWBT)	RE: Interconnection Efforts
627	37232	Josephson, Debbie (SWBT)	RE: Interconnection Efforts
625	37231	Tutwiler, Sandy (SWBT)	RE: Interconnection Efforts
702	37511	Josephson, Debbie (SWBT)	RE: CPN Billing Dispute Letter for BAN 610-401-0037-969
742	37813	Hall, Gia S (ATTOPS)	RE: UTEX DEOT study to switch HSTQTXRG6MD point code 005-096-184 Houston market
321	36537	Gilmore, Jerry W (SBC-OPS)	RE: UTEX~FCC website
316	36508	McCollough, Scott	VOIP Forum
320	36536	Lowell Feldman	RE: UTEX~Letter From SBC Dated Nov 19, 2003
331	36650	Lowell Feldman	ESP Call Flow Spread Sheet
482	37071	Josephson, Debbie (SWBT)	FW: SS7 B-Link Connections
468	37062	Josephson, Debbie (SWBT)	FW: SS7 B-Link Connections
621	37225	Josephson, Debbie (SWBT)	FW: Interconnection Efforts
595	37161	Lowell Feldman	RE: CPN dispute
596	37161	Cole, Bill (SBCSI)	RE: CPN dispute
586	37153	Josephson, Debbie (SWBT)	FW: B-Link Follow-up
359	36707	Josephson, Debbie (SWBT)	RE: UTEX-Dallas TX-DRAFT
383	36848	Elgin III, James B (SCB-OPS)	RE: "TIP TOP" INFO REQUESTED
393	36875	Lowell Feldman	SMU Cooperation -- Emergency Reply Needed
431	37014	Herrera, David (SWBT)	UTEX Technical Contact Numbers
440	37021	Herrera, David (SWBT)	RE: UTEX Technical Contact Numbers
444	37043	Josephson, Debbie (SWBT)	UTEX~Access over Local project
444	37043	Josephson, Debbie (SWBT)	UTEX~Access over Local project
448	37047	Lowell Feldman	RE: UTEX~Access over Local project
487	37078	Josephson, Debbie (SWBT)	RE: SS7 B-Link Connections

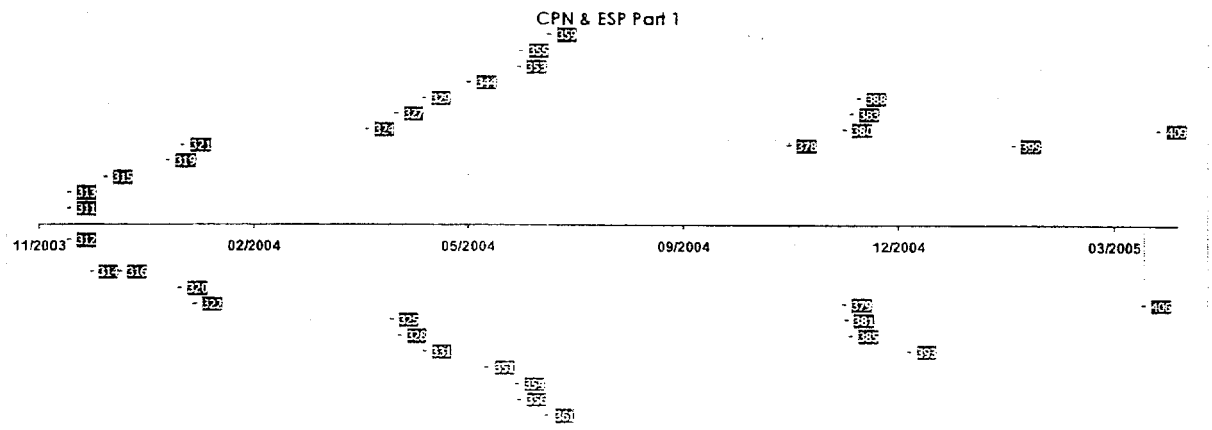
623	37226	Lowell Feldman	RE: Interconnection Efforts
432	37014	Stalnaker, Paul (SWBT)	RE: UTEX Technical Contact Numbers
469	37062	Josephson, Debbie (SWBT)	RE: SS7 B-Link Connections
470	37062	Lowell Feldman	RE: SS7 B-Link Connections
483	37071	Josephson, Debbie (SWBT)	RE: SS7 B-Link Connections
478	37063	Lowell Feldman	FW: Routing and Rating Treatment of New Technology Traffic
484	37071	Lowell Feldman	RE: SS7 B-Link Connections
652	37378	Josephson, Debbie (SWBT)	RE: TXD26381 UTEX Proceeding Dismissal
488	37078	Josephson, Debbie (SWBT)	RE: SS7 B-Link Connections
498	37106	Lowell Feldman	RE: CPN technical call
509	37113	Lowell Feldman	RE: CPN technical call
510	37113	Cole, Bill (SBCSI)	RE: CPN technical call
511	37113	Cole, Bill (SBCSI)	RE: CPN technical call
524	37114	Cole, Bill (SBCSI)	RE: CPN technical call
499	37106	Lowell Feldman	RE: CPN technical call
512	37113	Lowell Feldman	SS-7 B-Links Status and Request for NIS Meeting for establishing B-Links
532	37125	Josephson, Debbie (SWBT)	RE: SS-7 B-links Status and Request for NIS Meeting for establishing B-Links
534	37125	Tutwiler, Sandy (SWBT)	RE: Midland Odessa Interconnection
535	37125	Tutwiler, Sandy (SWBT)	RE: Midland Odessa Interconnection
568	37135	Josephson, Debbie (SWBT)	RE: B-Link Follow-up
578	37142	Josephson, Debbie (SWBT)	RE: B-Link Follow-up
589	37153	Josephson, Debbie (SWBT)	RE: B-Link Follow-up
590	37153	Lowell Feldman	RE: B-Link Follow-up
597	37161	Lowell Feldman	RE: CPN technical call
454	37051	Josephson, Debbie (SWBT)	RE: UTEX~Access over Local trunks
602	37168	Lowell Feldman	RE: SBC REJECT
622	37225	Lowell Feldman	RE: Interconnection Efforts
624	37226	Lowell Feldman	RE: Interconnection Efforts
626	37231	Lowell Feldman	RE: Interconnection Efforts
628	37232	Lowell Feldman	RE: Interconnection Efforts
311	36484	Josephson, Debbie (SWBT)	FW: Letter From SBC Dated Nov 19, 2003
312	36484	Mansir, Terri D (SWBT)	RE: Letter From SBC Dated Nov 19, 2003
313	36484	Josephson, Debbie (SWBT)	RE: Letter From SBC Dated Nov 19, 2003
314	36495	Josephson, Debbie (SWBT)	FW: Letter From SBC Dated Nov 19, 2003
315	36501	Josephson, Debbie (SWBT)	FW: Letter From SBC Dated Nov 19, 2003
319	36530	Josephson, Debbie (SWBT)	UTEX~Letter From SBC Dated Nov 19, 2003
322	36543	Josephson, Debbie (SWBT)	FW: UTEX~Letter From SBC Dated Nov 19,2003
324	36622	Josephson, Debbie (SWBT)	RE: UTEX~routing question
344	36670	Gilmore, Jerry W (SBC-OPS)	FW: Status of Informal Dispute Resolution
351	36679	Gilmore, Jerry W (SBC-OPS)	FW: Informal Dispute Status
353	36693	Josephson, Debbie (SWBT)	UTEX~CIC codes
355	36694	Clifford, Joan A (SWBT)	RE: UTEX~CIC codes
361	36707	Tutwiler, Sandy (SWBT)	RE: Updated NIS
379	36845	Barker, Richelle M (SBCSI)	RE: Follow up letter
380	36845	Jackson, Tony L (SWBT)	RE: Follow up letter
354	36693	Brett Nemeroff	Subject line deleted????
356	36694	Josephson, Debbie (SWBT)	UTEX~CIC codes
500	37106	Cole, Bill (SBCSI)	RE: CPN technical call

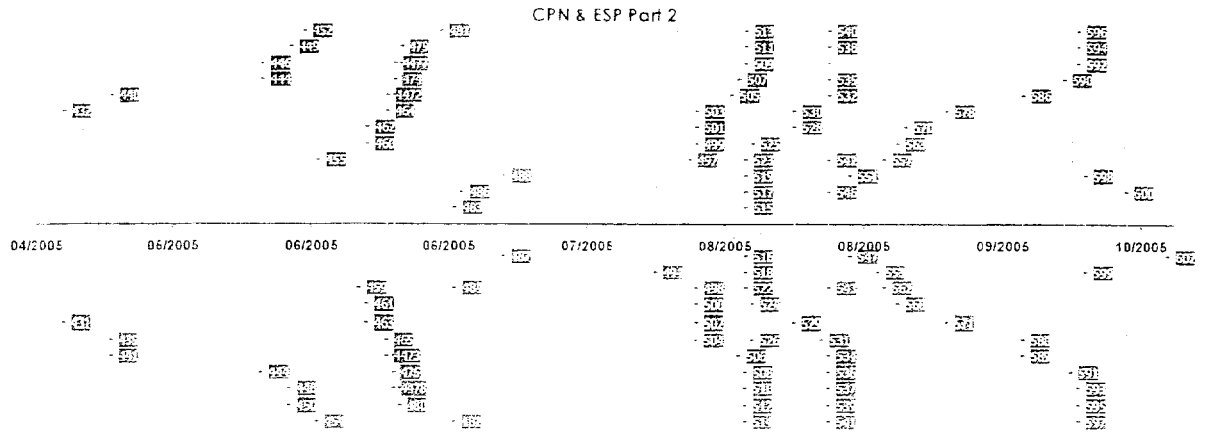
501	37106	Cole, Bill (SBCSI)	RE: CPN technical call
505	37111	Lowell Feldman	RE: CPN technical call
506	37112	Stalnaker, Paul (SWBT)	RE: CPN technical call
513	37113	Lowell Feldman	RE: CPN technical call
514	37113	Lowell Feldman	RE: CPN technical call
525	37114	Jones, Jennifer (PB)	RE: CPN technical call
526	37114	Jones, Jennifer (PB)	RE: CPN technical call
528	37120	Lowell Feldman	Update
507	37112	Schroepefer, Tyler D (SBC-OPS)	FW: CPN technical call
754	37856	Patterson, Judith A (ATTOPS)	FW: UTEX DEOT study on switch HSTQTXRG6MD point code 005-096-184 Houston Market
605	37174	Parker, David (SWBT)	RE: Waller Creek arbitration
515	37113	Cole, Bill (SBCSI)	RE: FW: UTEX call
449	37047	Boyce, Amie M (AIT)	Declined: UTEX~Internal conference call to discuss access over local issue
450	37047	Herrera, David (SWBT)	SBC Draft Response Ltr on AOL, SS7-B-Links, IXE, ISDN
471	37062	Goodwin, Mark (SBCSI)	FW: OC&C
472	37062	Gilmore, Jerry W (SBC-OPS)	FW: UTEX DEBIT ADJ
473	37062	Cole, Bill (SBCSI)	RE: UTEX DEBIT ADJ
474	37062	Gilmore, Jerry W (SBC-OPS)	RE: UTEX DEBIT ADJ
475	37062	Cole, Bill (SBCSI)	RE: UTEX DEBIT ADJ
479	37063	Gilmore, Jerry W (SBC-OPS)	RE: contacts
480	37063	Cole, Bill (SBCSI)	RE: contacts
718	37649	Cole, Bill (SBCSI)	RE: data
663	37413	Cole, Bill (SBCSI)	RE: UTEX no CPN
502	37106	Cole, Bill (SBCSI)	RE: SBC's response to UTEX letter dated 7/18
503	37106	Stalnaker, Paul (SWBT)	FW: CPN technical call
504	37106	Cole, Bill	CPN technical call
516	37113	Stalnaker, Paul (SWBT)	RE: CPN technical call
517	37113	Cole, Bill (SBCSI)	RE: CPN technical call
518	37113	Schroepfer, Tyler D (SBC-OPS)	RE: CPN technical call
519	37113	Josephson, Debbie (SWBT)	FW: CPN technical call
529	37120	Stalnaker, Paul (SWBT)	RE: CPN technical call
612	37184	Heinmiller, Wayne (SBCSI)	Legal/Regulatory Activity Update
530	37120	Jones, Jennifer (PB)	UTEX CPN/AOL Issue
536	37125	Elgin III, James B (SCB-OPS)	RE: UTEX~SS7 B-Links questions
551	37128	Cole, Bill (SBCSI)	FW: CPN technical call
562	37133	Josephson, Debbie (SWBT)	RE: CPN technical call
563	37133	Gilmore, Jerry W (SBC-OPS)	RE: CPN technical call
599	37162	Gilmore, Jerry W (SBC-OPS)	FW: UTEX
666	37415	Cole, Bill (SBCSI)	Utex cpn data
743	37832	Cole, Bill (ATTSI)	Utex cpn data
667	37425	Cole, Bill (SBCSI)	Utex CPN
664	37413	Cole, Bill (SBCSI)	Utex data
732	37701	Cole, Bill (ATTSI)	Utex data
734	37733	Cole, Bill (ATTSI)	Utex numbers
609	37183	Cole, Bill (SBCSI)	UTEX usage

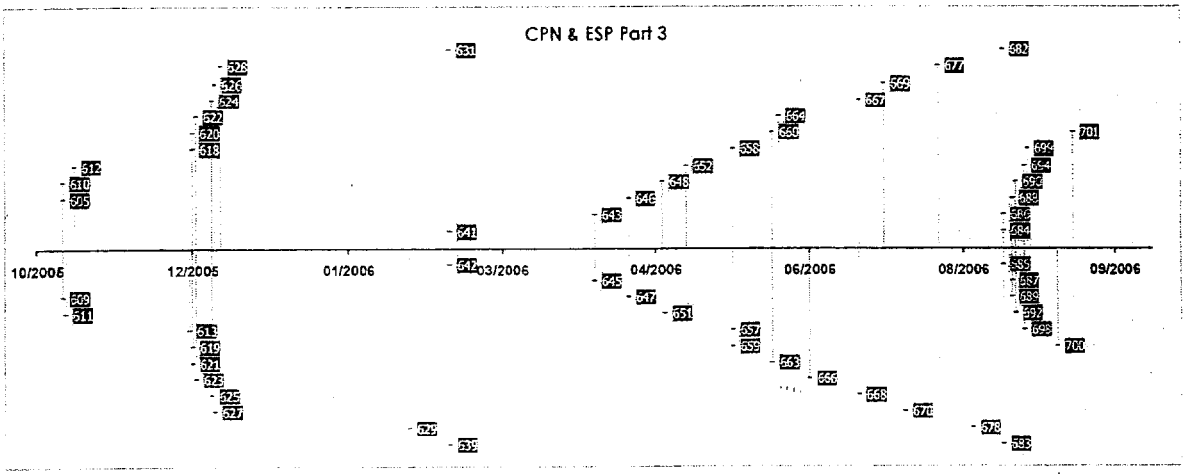
719	37649	Cole, Bill (SBCSI)	data
748	37838	Cole, Bill (ATTSI)	data
645	37355	Josephson, Debbie (SWBT)	FW: UTEX end users 3--062.xls
646	37355	Josephson, Debbie (SWBT)	Updated: UTEX~Discussion of end user traffic
658	37400	Cole, Bill (SBCSI)	Tentative: UTEX~Issues Matrix Status
659	37400	Josephson, Debbie (SWBT)	RE: UTEX~Issues Matrix Status
660	37400	Cole, Bill (SBCSI)	RE: UTEX~Issues Matrix Status
631	37295	Cole, Bill (SBCSI)	Accepted: Updated: UTEX~Discussion on recovery costs associated with transit, originating 8YY, and Interlata traffic (non-CPN)
639	37308	Cole, Bill (SBCSI)	Cabs billing
641	37308	Cole, Bill (SBCSI)	RE: Cabs billing
642	37308	Josephson, Debbie (SWBT)	RE: Cabs billing
643	37308	Cole, Bill (SBCSI)	RE: Cabs billing
446	37043	Cole, Bill (SBCSI)	FW: support data
749	37845	Cole, Bill (ATTSI)	FW: UTEX data
497	37105	Cole, Bill (SBCSI)	FW: UTEX terminating to SBC BI CPR June 2005
682	37478	Cole, Bill (SBCSI)	FW: UTEX CREDIT ADJ
683	37488	Josephson, Debbie (SWBT)	RE: UTEX CREDIT ADJ
684	37488	Cole, Bill (SBCSI)	RE: UTEX CREDIT ADJ
685	37488	Josephson, Debbie (SWBT)	RE: UTEX CREDIT ADJ
686	37488	Cole, Bill (SBCSI)	RE: UTEX CREDIT ADJ
687	37488	Josephson, Debbie (SWBT)	RE: UTEX CREDIT ADJ
688	37491	Josephson, Debbie (SWBT)	RE: UTEX CREDIT ADJ
689	37491	Adams, Bill (SBCSI)	RE: UTEX CREDIT ADJ
692	37492	Josephson, Debbie (SWBT)	RE: UTEX CREDIT ADJ
698	37495	Cole, Bill (SBCSI)	RE: UTEX CREDIT ADJ
669	37441	Vanhoof, Brian K (SBCSI)	FW: files
699	37495	Cole, Bill (SBCSI)	Deatil usage
700	37496	Gilmore, Jerry W (SBC-OPS)	FW: UTEX/Xspedius CPN Dispute (SPIRIT Record 2573)
701	37506	Adams, Bill (SBCSI)	New Aging UTEX
613	37187	Cole, Bill (SBCSI)	RE: UTEX usage
733	37701	Cole, Bill (ATTSI)	Utex data
735	37733	Cole, Bill (ATTSI)	Utex numbers
610	37183	Cole, Bill (SBCSI)	UTEX usage
694	37492	Josephson, Debbie (SWBT)	RE: UTEX CREDIT ADJ
739	37771	Faustmann, Daniel K (ATTSI)	RE: UTEX
740	37771	Hobbs, Carolyn (ATTSWBT)	RE: UTEX
744	37834	Juszkiewicz, Joanna C (ATTPB)	FW: UTEX PLU
745	37834	Josephson, Debbie (SWBT)	RE: UTEX PLU
746	37834	Juszkiewicz, Joanna C (ATTPB)	RE: UTEX PLU
747	37834	Josephson, Debbie (ATTSWBT)	RE: UTEX PLU
611	37183	Cole, Bill (SBCSI)	UTEX usage
464	37061	Gilmore, Jerry W (SBC-OPS)	RE: UTEX DEBIT ADJ
600	37162	Gilmore, Jerry W (SBC-OPS)	FW: UTEX
441	37021	Herrera, David (SWBT)	RE: UTEX Technical Contact Numbers
557	37132	SBC	Joint CPN testing Agenda

677	37456	Boyce, Amie M (ASI-AIT)	FW: files
670	37449	Boyce, Amie M (ASI-AIT)	FW: UTEX Inertia Billing Disputes
727	37664	Andrews, Peter M (ATTSI)	RE: UTEX validation - January 11, 2007 BI and AMA data
598	37161	Gilmore, Jerry W (SBC-OPS)	RE: UTEX
486	37072	Cole, Bill	Letter mailed to UTEX on $636K backbilling for no CPN
537	37125	Tutwiler, Sandy (SWBT)	FW: Midland Odessa Interconnection
538	37125	Josephson, Debbie (SWBT)	RE: Midland Odessa Interconnection
539	37125	Tutwiler, Sandy (SWBT)	RE: Midland Odessa Interconnection
540	37125	Lowell	RE: Midland Odessa Interconnection
541	37125	Lowell	RE: Midland Odessa Interconnection
542	37125	Lowell	RE: Midland Odessa Interconnection
543	37125	Lowell	B-Links
570	37135	Lowell	B-Link Follow-up
580	37142	Lowell	RE: B-Link Follow-up
459	37057	Brett Nemeroff	SS7 B-Link Connections
546	37125	Lowell Feldman	RE: Midland Odessa Interconnection
651	37377	Brett Nemeroff	Updated Trunk Forecasts
385	36848	Woytek, Brian D (SBCSI)	RE: Follow up letter
388	36851	Gilmore, Jerry W (SBC-OPS)	RE: Follow up letter
455	37051	Josephson, Debbie (SWBT)	RE: UTEX~Access over Local trunks
460	37058	Tutwiler, Sandy (SWBT)	RE: UTEX~Access over Local project
461	37058	Josephson, Debbie (SWBT)	FW: SS7 B-Link Connections
462	37058	Josephson, Debbie (SWBT)	FW: SS7 B-Link Connections
465	37061	Faith, Douglas P (AIT)	RE: SS7 B-Link Connections
466	37061	Josephson, Debbie (SWBT)	FW: SS7 B-Link Connections
467	37061	Gilmore, Jerry W (SBC-OPS)	RE: SS7 B-Link Connections
481	37069	Josephson, Debbie (SWBT)	FW: Routing and Rating Treatment of New Technology Traffic
531	37124	Lowell	RE: SS-7 B-links Status and Request for NIS Meeting for establishing B-Links
547	37125	Lowell	RE: SS-7 B-links Status and Request for NIS Meeting for establishing B-Links
571	37136	Debbie Josephson	Placeholder Request Form for CPN billings
381	36846	Woytek, Brian D (SBCSI)	RE: Follow up letter
690	37491	Josephson, Debbie (SWBT)	RE: Revenue Events - Upside and Risks
715	37630	Hall, Gia S (SBC-OPS)	RE: UTEX
721	37651	Constable, Jason (SBC-OPS)	FW: UTEX ICA
729	37670	Adams, Bill (ATTSI)	UTEX Placeholder needs update
463	37058	Gilmore, Jerry W (SBC-OPS)	RE: SS7 B-Link Connections
629	37234	Gilmore, Jerry W (SBC-OPS)	RE: Interconnection Efforts
522	37113	Cole, Bill	FW: CPN Technical Call
553	37128	Feldman, Lowell	FW: CPN Technical Call
399	36923	Lowell Feldman	Negotiation of replacement agreement; response to 1/31/05 email w/ subject "FW: UTEX Reservation of Rights/Non-Negotiable Position Statement"
523	37113	SBC	Petition to FCC on fraudulent Phantom traffic issues in the industry
325	36634	Feldman, Lowell	Informal Dispute Resolution
327	36636	FCC Order	FCC Order on IP in te Middle

328	36638	Josephson, Debbie	UTEX-Dispute Resolution
329	36649	Lowell Feldman	RE: UTEX~Updated CLEC profile dated 10/3/03, replacing profile dated 1/14/03
378	36819	SBC	Premiere
494	37100	Cole, Bill	Letter mailed to UTEX on backbilling for no CPN
703	37555	Fears, Nancy	RE: UTEX Communications Corp. - Processing of this 500 PCS Application Has been Suspended
704	37558	DeHaven, Brian	RE: UTEX Communications Corp. - Processing of this 500 PCS Application Has been Suspended
716	37630	Meier, Robin	RE: 500-NXX routing between networks
520	37113	Cole, Bill (SBCSI)	FW: CPN technical call
548	37126	Cole, Bill (SBCSI)	RE: CPN technical call
549	37126	Lowell Feldman	RE: CPN technical call
550	37128	Lowell Feldman	FW: CPN technical call
552	37128	Cole, Bill (SBCSI)	FW: CPN technical call
554	37131	Cole, Bill (SBCSI)	cpn delivery
569	37135	Cole, Bill (SBCSI)	RE: cpn delivery



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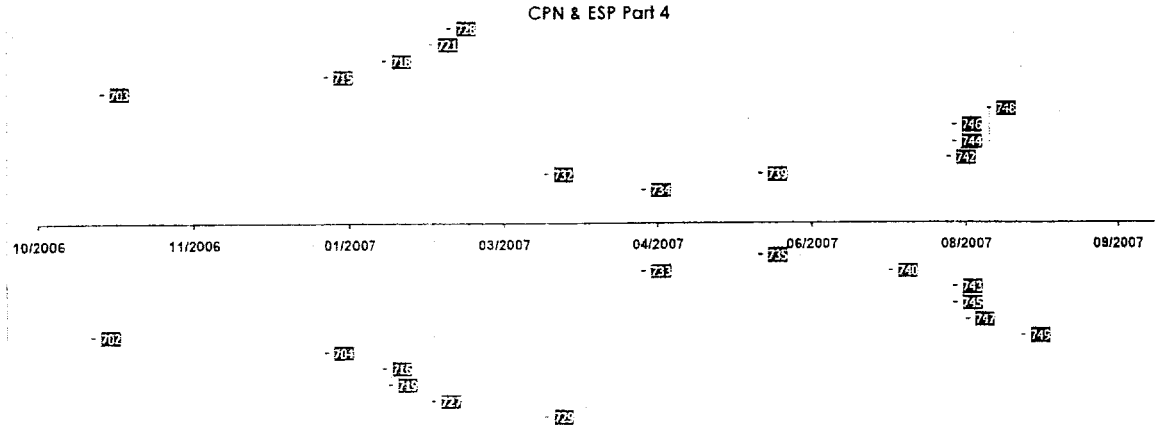
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09/2007

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Q: ARE OTHER "NON-ICA" SOLUTIONS FOR SOLVING THE "PHANTOM TRAFFIC" PROBLEM PERMITTED UNDER THE TERMS OF THE ICA?

A: UTEX and WCI have also jointly solved the so called "Phantom Traffic" problem presented to the FCC by Legacy ILECs in the Missoula proceeding. "Phantom Traffic" is a term the ILECs invented to describe what they assert are fraudulent activities by other carriers who strip or manipulate CPN. As with this case, however, while the ILECs assert the problem is IXC misrouting or CPN manipulation, the real target is VoIP. UTEX has spent considerable technical effort on solving these problems. For more discussion of the particular efforts and the larger regulatory setting, see the testimony for Lowell Feldman on this issue.

Q: DID UTEX ROUTE AND DELIVER TO AT&T TEXAS' LOCAL INTERCONNECTION TRUNKS ANY PSTN ORIGINATED CALLS DESTINED FOR NPA-NXX'S ASSIGNED TO AT&T TEXAS END-USERS IN LOCAL EXCHANGE AREAS THAT DIFFERED FROM THE LOCAL EXCHANGE AREA OF THE ORIGINATING CALLERS' NPA-NXXS? IF SO, IS UTEX RESPONSIBLE FOR THE INTERCARRIER COMPENSATION DUE TO AT&T TEXAS ON SUCH CALLS?

A: UTEX cannot on its own determine if a particular call originated from its customers originated on the PSTN. Instead, UTEX relies on the representation from each of its customers that all traffic destined to UTEX is ESP originated, and the confirmed ESP status of certain customers[8], to assure that carriers are not misrouting traffic over the UTEX network. However, we admit the possibility that some traffic may be accidentally or intentionally mis-routed.

[8] See Exhibit 759.

UTEX works proactively with its customers to assure that mis-routed traffic is identified and removed. UTEX has no interest in passing IXC originated calls to AT&T Texas. That is not our business plan. This point has been made repeatedly to AT&T, and the response has been nothing but incredulity and arrogance.

UTEX has never received formal notification from AT&T of specific and actionable evidence that traffic is being misrouted on to the UTEX network. UTEX has for years anticipated such notifications from AT&T, and is prepared to assist AT&T in identifying the mis-routing carriers to the greatest extent possible. UTEX has repeatedly and specifically solicited this information as well. In a email dated September 7, 2004, Lowell Feldman stated "In the event that non-enhanced traffic from a traditional IXC under FCC rule 69.5 does find its way on to our combined networks, I anticipate that we will work together to collect the access due from the IXC". [RFP-10-12016]. Internal AT&T email indicates that Mr. Jerry Gilmore believed that "I'm not thinking that this deserves a response...If and when, we learn that traffic being routed is not in compliance with our view of the ICA or prevailing rules, we'll have a dispute at that point." Furthermore, on the 8/30 join testing call, Mr. Paul Stalnaker of AT&T made the claim to have data proving that UTEX was intentionally misrouting traffic. Mr. Lowell Feldman demanded supporting data and re-iterated his promised to work at a joint solution to eliminate the problem. To date nothing has been conveyed to UTEX.

Instead AT&T apparently reserved test results and data for internal use and withheld this data from UTEX. This internal data appears to be of two kinds: limited network testing initiated by AT&T and originated from the AT&T network [RFP-1-10-13546_13457], and a systematic effort to cold-call UTEX customers and interrogate them about their choice of service provider

[RFP-1-1-129-130]. In neither case is the gathered information useful for detecting and removing mis-routed traffic from the network. The results seem to be mainly for "show".

Finally, to the extent that mis-routed traffic does reach the AT&T network, UTEX maintains that it is the responsibility of the mis-routing carrier, and not UTEX or it's ESP customers, to pay any interexchange access that AT&T deems applicable. UTEX is not complicit with any traditional IXC, nor does it believe that any of its customers are intentionally routing traditional ICX traffic over the UTEX network. In my understanding of the ICA, both parties are required to work together to identify and track down mis-routed traffic. By unilaterally sending a bill, with only cursory explanation, and by an outright refusal to work with UTEX, AT&T has acted in bad faith.

DPL ISSUES 73-82.

Q: DOES THE TRAFFIC AT&T TEXAS ASSERTS IS "INTERLATA TRAFFIC" FLOW FROM OR TERMINATE TO A UTEX CUSTOMER THAT HAS A PRESENCE IN THE SAME LATA AS THE CALLING OR CALLED AT&T TEXAS CUSTOMER?

A: Yes. UTEX, as a policy, does not route InterLATA. All of UTEX's customers are required to meet UTEX for service in the situs of the LATA in which the customer wishes to terminate traffic. If a UTEX customer attempts to route traffic destined, for example, to Houston over trunks established for the Dallas situs, UTEX rejects the call with treatment ITU Q.850 Cause code 1 (Unallocated). Thus, calls which AT&T Texas are claiming are InterLATA, are actually IntraLATA on the UTEX network.

DPL ISSUES 88, 94-95.

Q: HAS AT&T TEXAS PROVIDED SUFFICIENT CALL DETAIL TO QUANTIFY ANY AMOUNTS THAT MAY BE OWED?

A: No. To date AT&T has produced incomplete data of generally poor quality. In particular, AT&T has not produced call detail for the periods of 11/2006 to 3/2007. Furthermore, detailed analysis of the AT&T data allows limited or no agreement with neither UTEX switch data, nor AT&T's billings.

In an attempt to make sense of the AT&T billing practices, UTEX reproduced the billing processes and logic that AT&T claims are used to generate the bills [RFP1--9-18, RFP-1-9-67 ff]. To this end, tests were performed on both UTEX switch recordings and AT&T AMA which categorized the UTEX traffic into the following types: "Intrastate InterLATA", "Interstate InterLATA", "Bill and Keep", "Invalid", "Empty CPN". A number of problems with the side-by-side comparison are evident. Particularly troubling is the fact that for the periods of 3/2007 to 8/2007, AT&T AMA shows a larger number of call seconds associated with "Empty CPN" traffic than is shown in the UTEX data, while the overall volume of call seconds in the AT&T AMA is less than the overall call second volume in the UTEX data. Furthermore, the categorization of the traffic provides absolutely no insight into the billings. Nothing matches up.

In addition to AMA call detail. AT&T also produced a limited amount of SS7 message tracing. UTEX attempted to match calls presented in the SS7 data to calls in the AMA data on a call by call basis. UTEX was particularly interested in the result because of statements made by Mr. Peter Andrews that this exercise could be accomplished within millisecond accuracy. However, UTEX found that this task was nearly impossible within thirty seconds of accuracy. To perform the search. UTEX used a search tuple of (Calling Party Number, Called Party Number, Call Duration), which had the property of being invariant and insensitive to relative timing differences between the networks.

First, UTEX determined the relative timing difference between the datasets. This value, which takes into account time zone differences as well as basic synchronization mismatch, was used as a starting point for searching. When UTEX attempted to match call durations within one millisecond, and the call start time within the fixed offset plus or minus five minutes, UTEX was only able to match 1% of calls. When call duration tolerance of thirty seconds was used instead, UTEX was still only able to match on average roughly 50% of calls.

On further investigation, UTEX discovered that a significant number of calls in the SS7 dataset contain negative call durations, i.e. the timestamp for call termination precedes the timestamp for call initiation. Because of this finding, UTEX concluded that grave discrepancies existed between the SS7 and AMA datasets, and further analysis was not conducted.

Q: SHOULD THE COMMISSION DECLARE THAT THE ICA DOES NOT OPERATE TO PREVENT AN AWARD AND FINDING IN THE APPROPRIATE VENUE THAT AT&T TEXAS MUST PAY UTEX'S PAST DUE BILLS FOR SIGNALING LAYER TRANSLATION SERVICE?

A: To the extent that AT&T Texas can compel UTEX to purchase services from AT&T Texas, which UTEX does not want or request, under the theory that UTEX and UTEX's customers benefit from the service, then it stands to reason that UTEX should be able to compel AT&T Texas to purchase services from UTEX which benefit AT&T's customers. UTEX's business plan is to interoperate new communications technologies with the PSTN – with AT&T Texas customers. Under any sensible theory of network effects, we are enhancing the value of the AT&T network. For further discussion, see testimony from Lowell Feldman.

Q: IS VOIP AN ENHANCED SERVICE? IS VOIP AN INFORMATION SERVICE?

A: The term "enhanced service" is defined at 47 C.F.R. § 67.702(a) as follows:

> For the purpose of this subpart, the term enhanced service shall refer to services, offered over common carrier transmission facilities used in interstate communications, which employ computer processing applications that act on the format, content, code, protocol or similar aspects of the subscriber's transmitted information; provide the subscriber additional, different, or restructured information; or involve subscriber interaction with stored information. Enhanced services are not regulated under title II of the Act.

The term "information service" is defined at 47 USC § 153(20) as follows:

> The term "information service" means the offering of a capability for generating, acquiring, storing, transforming, processing, retrieving, utilizing, or making available information via telecommunications, and includes electronic publishing, but does not include any use of any such capability for the management, control, or operation of a telecommunications system or the management of a telecommunications service.

Anyone remotely familiar with IP telephony technologies recognizes immediately that the above definitions apply to VoIP communications. VoIP is both an enhanced service and an information service.

Each IP-based communication that interacts with the PSTN must have a change in content AND a change in form. By changing form and content VoIP providers are is "enhancing" and the change in form and/or content alone renders such applications/services as enhanced/information services rather than telecommunications services. The change in form to IP and the change in content allows ESPs to provide features and functionalities and applications/services unlike anything heretofore possible on the PSTN. Examples include speech to text and text to speech, delivery of voice mail to email clients, the ability to make two different edge devices simultaneously ring when a single number is dialed (IP phones in different locations, or an IP phone and a cell phone, or an IP phone and a traditional wireline phone), click-to-call and a whole host of capabilities that have yet to be rolled out.

Q: DOES THIS CONCLUDE YOUR TESTIMONY FOR THIS PHASE OF THE CASE?

A: Yes.

Table 1

Total Call Seconds and Completed Calls by Dataset

		Call Seconds		Completed Calls	
year	month	UTEX	ATT	UTEX	ATT
2006	8	1,975,049,137	1,793,638,067	13,079,652	11,599,436
2006	9	1,841,589,250	1,663,017,030	11,635,311	10,373,029
2006	10	2,234,299,711	1,032,806,967	14,351,813	6,384,121
2006	11	3,033,009,102	9,669,574	18,622,556	36,590
2006	12	3,000,654,057	no data	18,006,407	no data
2007	1	3,289,302,915	no data	19,514,684	no data
2007	2	3,476,452,661	no data	19,404,476	no data
2007	3	4,317,728,006	4,263,152,890	23,874,562	23,569,664
2007	4	4,038,250,201	4,024,831,787	23,103,674	22,953,867
2007	5	5,653,317,989	4,880,317,449	35,391,975	30,600,772
2007	6	4,291,661,313	4,290,800,299	29,752,060	29,607,606
2007	7	5,377,949,407	5,168,002,510	33,968,255	32,806,642
2007	8	5,493,751,468	4,982,135,523	32,731,627	29,589,707

Table 2

Completed Calls in Datasets by CPN Digit Categories

		0 Digits		1-5 Digits		6-10 Digits		> 10 Digits		Grand Totals	
Year	Mo	UTEX	ATT	UTEX	ATT	UTEX	ATT	UTEX	ATT	UTEX	ATT
2006	8	2.6%	2.7%	0.9%	0.9%	93.7%	93.4%	2.8%	3.0%	100.0%	100.0%
2006	9	2.0%	2.0%	0.9%	1.0%	94.2%	93.9%	2.8%	3.1%	100.0%	100.0%
2006	10	2.5%	3.5%	0.9%	0.8%	92.8%	90.5%	3.8%	5.2%	100.0%	100.0%
2006	11	7.1%	21.9%	1.1%	1.9%	88.7%	68.3%	3.1%	8.0%	100.0%	100.0%
2006	12	4.0%	no data	0.7%	no data	88.5%	no data	6.8%	no data	100.0%	no data
2007	1	3.4%	no data	0.8%	no data	87.5%	no data	8.3%	no data	100.0%	no data
2007	2	2.8%	no data	0.9%	no data	88.5%	no data	7.9%	no data	100.0%	no data
2007	3	2.9%	3.7%	1.0%	1.0%	88.6%	87.8%	7.5%	7.5%	100.0%	100.0%
2007	4	4.7%	5.5%	1.9%	1.9%	87.1%	86.3%	6.3%	6.3%	100.0%	100.0%
2007	5	7.4%	7.9%	1.1%	1.1%	85.9%	85.6%	5.6%	5.5%	100.0%	100.0%
2007	6	8.8%	9.5%	1.4%	1.4%	83.3%	82.7%	6.4%	6.4%	100.0%	100.0%
2007	7	8.7%	9.6%	1.3%	1.3%	83.9%	83.1%	6.1%	6.0%	100.0%	100.0%
2007	8	6.8%	7.8%	1.2%	1.2%	85.7%	84.6%	6.3%	6.3%	100.0%	100.0%

		0 Digits		1-5 Digits		6-10 Digits		> 10 Digits		Grand Totals	
Year	Mo	UTEX	ATT	UTEX	ATT	UTEX	ATT	UTEX	ATT	UTEX	ATT
2006	8	335,712	317,661	114,539	107,960	12,256,831	10,830,748	372,570	343,067	13,079,652	11,599,436
2006	9	232,147	210,973	105,837	101,780	10,966,266	9,735,702	331,061	324,574	11,635,311	10,373,029
2006	10	359,414	221,655	123,376	52,460	13,323,615	5,775,471	545,408	334,535	14,351,813	6,384,121
2006	11	1,313,156	8,005	209,289	683	16,525,279	24,973	574,832	2,929	18,622,556	36,590
2006	12	719,412	no data	118,901	no data	15,935,139	no data	1,232,955	no data	18,006,407	no data
2007	1	667,662	no data	157,220	no data	17,078,169	no data	1,611,633	no data	19,514,684	no data
2007	2	534,182	no data	170,890	no data	17,171,438	no data	1,527,966	no data	19,404,476	no data
2007	3	689,761	881,613	240,373	236,715	21,149,240	20,688,759	1,795,188	1,762,577	23,874,562	23,569,664
2007	4	1,080,420	1,255,169	439,138	435,678	20,123,269	19,811,709	1,460,847	1,451,311	23,103,674	22,953,867
2007	5	2,607,205	2,405,554	377,642	327,444	30,417,944	26,186,340	1,989,184	1,681,434	35,391,975	30,600,772
2007	6	2,628,112	2,813,384	422,076	419,636	24,792,145	24,478,279	1,909,727	1,896,307	29,752,060	29,607,606
2007	7	2,957,642	3,134,264	438,348	419,349	28,486,646	27,275,579	2,085,619	1,977,450	33,968,255	32,806,642
2007	8	2,219,313	2,315,927	403,150	368,923	28,058,443	25,031,141	2,050,721	1,873,716	32,731,627	29,589,707

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Jurisdiction for by CPN Content	UTEX Jurisdiction for Rating - All IGIPOP routed as Local traffic and treated as No-Compensation Due		2006 (Call Seconds as a % of Total)) 8	9	10	11	12
Empty	Empty CPN content - IGIPOP Customer - No Compensation Due	UTEX	2.5%	2.0%	2.7%	7.0%	4.3%
		ATT	3.4%	2.0%	3.9%	21.6%	no data
state InterLATA	CPN representation for different LATAs - IGIPOP Customer - No Compensation Due	UTEX	24.4%	31.9%	31.3%	27.1%	24.3%
		ATT	22.9%	31.1%	33.1%	21.9%	no data
state InterLATA	CPN representation for different LATAs - IGIPOP Customer - No Compensation Due	UTEX	44.0%	37.5%	36.0%	33.4%	35.7%
		ATT	45.4%	38.9%	33.9%	26.5%	no data
same LATA and as "Bill and Keep"	CPN representation for the same LATA - IGIPOP Customer - No Compensation Due	UTEX	15.0%	15.7%	20.2%	19.3%	20.1%
		ATT	13.3%	14.1%	17.9%	13.0%	no data
Unknown	CPN content representation from IGIPOP Customer, which does not conflict with known E.164 addresses (expressly follows terms of IGIPOP tariff related to CPN represenattion) - No Compensation Due	UTEX	14.2%	12.9%	9.9%	13.2%	15.6%
		ATT	15.0%	13.9%	11.2%	17.1%	no data
Total		UTEX	100.0%	100.0%	100.0%	100.0%	100.0%
		ATT	100.0%	100.0%	100.0%	100.0%	no data

Jurisdiction for by CPN Content	UTEX Jurisdiction for Rating - All IGIPOP routed as Local traffic and treated as No-Compensation Due		2006 (Call Seconds) 8	9	10	11	12
Empty	Empty CPN content - IGIPOP Customer - No Compensation Due	UTEX	48,905,593	36,081,438	60,076,880	212,297,062	127,890,980
		ATT	61,058,253	33,995,755	40,180,027	2,088,890	no data
		difference	(12,152,660)	2,085,683	19,896,853	210,208,172	
		diff % of UTEX	-24.85%	5.78%	33.12%	99.02%	
state InterLATA	CPN representation for different LATAs - IGIPOP Customer - No Compensation Due	UTEX	481,006,304	588,001,356	699,834,062	820,468,501	728,252,528
		ATT	410,523,662	516,591,955	341,992,853	2,117,500	no data
		difference	70,482,642	71,409,401	357,841,209	818,351,001	
		diff % of UTEX	14.65%	12.14%	51.13%	99.74%	
state InterLATA	CPN representation for different LATAs - IGIPOP Customer - No Compensation Due	UTEX	869,072,053	690,423,636	803,884,661	1,012,715,771	1,071,131,734
		ATT	815,200,145	647,131,523	350,168,570	2,559,481	no data
		difference	53,871,908	43,292,113	453,716,091	1,010,156,290	
		diff % of UTEX	6.20%	6.27%	56.44%	99.75%	
same LATA and as "Bill and Keep"	CPN representation for the same LATA - IGIPOP Customer - No Compensation Due	UTEX	296,497,327	289,652,568	450,355,338	585,875,373	604,620,947
		ATT	238,387,718	233,809,395	184,921,500	1,254,565	no data
		difference	58,109,609	55,843,173	265,433,838	584,620,808	
		diff % of UTEX	19.60%	19.28%	58.94%	99.79%	
Unknown	CPN content representation from IGIPOP Customer, which does not conflict with known E.164 addresses (expressly follows terms of IGIPOP tariff related to CPN represenattion) - No Compensation Due	UTEX	279,567,860	237,430,252	220,148,770	401,652,395	468,757,868
		ATT	268,468,289	231,488,402	115,544,017	1,649,138	no data
		difference	11,099,571	5,941,850	104,604,753	400,003,257	
		diff % of UTEX	3.97%	2.50%	47.52%	99.59%	
Total		UTEX	1,975,049,137	1,841,589,250	2,234,299,711	3,033,009,102	3,000,654,057
		ATT	1,793,638,067	1,663,017,030	1,032,806,967	9,669,574	no data
		difference	181,411,070	178,572,220	1,201,492,744	3,023,339,528	
		diff % of UTEX	9.19%	9.70%	53.77%	99.68%	

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			2007 (Call Seconds as a % of Total)				
Jurisdiction for by CPN Content	UTEX Jurisdiction for Rating - All IGIPOP routed as Local traffic and treated as No-Compensation Due		1	2	3	4	5
Empty	Empty CPN content - IGIPOP Customer - No Compensation Due	UTEX	4.2%	3.7%	3.3%	5.2%	7.3%
		ATT	no data	no data	4.4%	6.2%	7.9%
state InterLATA	CPN representation for different LATAs - IGIPOP Customer - No Compensation Due	UTEX	22.1%	22.1%	20.7%	20.1%	21.1%
		ATT	no data	no data	20.4%	19.9%	21.0%
state InterLATA	CPN representation for different LATAs - IGIPOP Customer - No Compensation Due	UTEX	34.1%	32.3%	34.2%	32.9%	30.9%
		ATT	no data	no data	33.8%	32.5%	30.5%
same LATA and as "Bill and Keep"	CPN representation for the same LATA - IGIPOP Customer - No Compensation Due	UTEX	20.0%	23.7%	25.5%	26.0%	25.1%
		ATT	no data	no data	25.3%	25.8%	25.0%
Unknown	CPN content representation from IGIPOP Customer, which does not conflict with known E.164 addresses (expressly follows terms of IGIPOP tariff related to CPN represenattion) - No Compensation Due	UTEX	19.6%	18.2%	16.4%	15.9%	15.7%
		ATT	no data	no data	16.2%	15.7%	15.5%
Total		UTEX	100.0%	100.0%	100.0%	100.0%	100.0%
		ATT	no data	no data	100.0%	100.0%	100.0%

			2007 (Call Seconds)				
Jurisdiction for by CPN Content	UTEX Jurisdiction for Rating - All IGIPOP routed as Local traffic and treated as No-Compensation Due		1	2	3	4	5
Empty	Empty CPN content - IGIPOP Customer - No Compensation Due	UTEX	137,921,235	128,910,141	141,915,571	209,795,968	411,027,895
		ATT	no data	no data	186,037,955	247,547,703	385,056,180
		difference			(44,122,384)	(37,751,735)	25,971,715
		diff % of UTEX			-31.09%	-17.99%	6.32%
state InterLATA	CPN representation for different LATAs - IGIPOP Customer - No Compensation Due	UTEX	728,160,088	768,919,289	892,043,656	812,033,066	1,192,832,548
		ATT	no data	no data	868,598,083	799,878,494	1,027,056,503
		difference			23,445,573	12,154,572	165,776,045
		diff % of UTEX			2.63%	1.50%	13.90%
state InterLATA	CPN representation for different LATAs - IGIPOP Customer - No Compensation Due	UTEX	1,123,238,226	1,122,168,922	1,477,442,607	1,327,432,938	1,744,786,346
		ATT	no data	no data	1,440,337,537	1,306,790,408	1,490,860,435
		difference			37,105,070	20,642,530	253,925,911
		diff % of UTEX			2.51%	1.56%	14.55%
same LATA and as "Bill and Keep"	CPN representation for the same LATA - IGIPOP Customer - No Compensation Due	UTEX	656,259,224	824,734,550	1,100,185,638	1,048,143,415	1,418,269,580
		ATT	no data	no data	1,077,578,532	1,037,543,952	1,222,503,939
		difference			22,607,106	10,599,463	195,765,641
		diff % of UTEX			2.05%	1.01%	13.80%
Unknown	CPN content representation from IGIPOP Customer, which does not conflict with known E.164 addresses (expressly follows terms of IGIPOP tariff related to CPN represenattion) - No Compensation Due	UTEX	643,724,142	631,719,759	706,140,534	640,844,814	886,401,620
		ATT	no data	no data	690,600,783	633,071,230	754,840,392
		difference			15,539,751	7,773,584	131,561,228
		diff % of UTEX			2.20%	1.21%	14.84%
Total		UTEX	3,289,302,915	3,476,452,661	4,317,728,006	4,038,250,201	5,653,317,989
		ATT	no data	no data	4,263,152,890	4,024,831,787	4,880,317,449
		difference			54,575,116	13,418,414	773,000,540
		diff % of UTEX			1.26%	0.33%	13.67%